



Dennis Borel <DBorel@cotwd.org> on 02/01/2002 02:00:53 PM

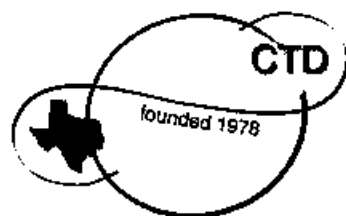
To: vss@FEC
cc: Belinda Carlton <belindagc@aol.com>
Subject: [Fwd: Public Comment on Voting Systems]

X-Mozilla-Status2: 00000000
Message-ID: <3C5AE499.8EBD76B1@cotwd.org>
Date: Fri, 01 Feb 2002 12:55:21 -0600
From: Dennis Borel <DBorel@cotwd.org>
Organization: CTD
X-Mailer: Mozilla 4.73 [en] (WinNT; U)
X-Accept-Language: en
MIME-Version: 1.0
To: vss@fec.gove
CC: Belinda Carlton <belindagc@aol.com>
Subject: Public Comment on Voting Systems
Content-Type: multipart/mixed; boundary="-----33489A4194058DB39EAD19A8"

Attached in a Microsoft word document are comments of the Coalition of
Texans with Disabilities.



- voting system comments by CTD 2-1-02.doc



Coalition of Texans with Disabilities
316 W. 12th Street, Ste. 405
Austin, TX 78701
(512) 478-3366
FAX (512) 478-3370
cotwd@cotwd.org
www.cotwd.org

February 1, 2002

Ms. Penelope Bonsall
Director
Office of Election Administration
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463
Public Comment on Notice 2001:

Voluntary Standards for Computerized Voting Systems

Dear Ms. Bonsall:

Founded in 1978, the Coalition of Texans with Disabilities (CTD) is one of the oldest and largest cross-disability coalitions in the U. S. Under the leadership of retired executive director Belinda Carlton, CTD became the foremost disability organization on the issue of accessible voting. CTD is a major reason that Texas leads the nation, having passed the first piece of legislation requiring that individuals with disabilities be provided equal opportunity to cast a secret ballot. HB1053 was passed in 1999 by the 76th Texas Legislature. Ms. Carlton wrote many of the rules and standards as an appointee to the Texas Secretary of State Task Force on Accessible Voting.

In these comments I will elaborate on two broad problems I find with the proposed standards for computerized voting systems:

The proposed FEC rules for accessibility limit access to select groups of citizens with disabilities. We can and we must be fully inclusive of all citizens, including all citizens with disabilities - physical, sensory and mental - in legislation and standards for voting systems.

CTD is a statewide coalition of individuals and organizations working together to eliminate barriers to equal and full participation in life. CTD is funded in part by the Texas Commission for the Deaf and Hard of Hearing, the SBC Foundation, members and contributors.

Ms. Penelope Bonsall

Page Two

You acknowledge in the Notice and in the Overview, Issues Not Addressed by the Revised Standards, Detailed Human Interface and Usability Standards that *"human interface considerations are an integral part of developing an accurate, reliable voting system."* I would ask that you add at the end of this quote: **"that provides all citizens the opportunity to cast a secret ballot."** Certain individuals must be assisted by another individual, most preferably an election official in order to cast an accurate ballot. The FEC should include this issue in your investigation of human factor issues for development of future specifications. Showing the individual who is blind how to operate a voting machine is no different than assisting the individual with a cognitive limitation. Especially individuals with mental impairments, and all citizens with disabilities to a degree, are not provided non-discriminatory and appropriate accommodation at the ballot box.

Additionally, the FEC should acknowledge reality and amend Introduction, 1.4 Accessibility for Individuals with Disabilities with the addition of a sentence at the end of paragraph 1 that reads: **"Adopting the technical standards for accessibility will not entirely eliminate the need to accommodate the needs of certain voters with disabilities by human interface."**

In Texas our rules were cutting edge when written, but the standards for access written by the U.S. Access Board are a great improvement. Still, 2.2.7.1 Common Standards and 2.2.7.2 DRE Standards hinder advancement of technology that will provide the greatest access. At CTD we had three demonstrations of voting systems with a broad range of disabilities represented. Applying the Common Standards found in the FEC proposed rules, 2.2.7.1 would have rendered many systems unusable by individuals with limited reach and/or limited mobility. Additionally, 2.2.7.1 Common Standards will do nothing to provide the opportunity to cast a secret ballot for countless citizens with disabilities and older Americans who have mental disabilities. The FEC should add language acknowledging the limitation of these rules be included in 2.2.7 Accessibility with the insertion of **"a broad range"** between *"needs of"* and *"voters with disabilities."*

As suggested for the Introduction, 1.4 above, language acknowledging the need for human interface, as an integral part of meeting the accessibility needs of individuals with disabilities should be included in 2.2.7 Accessibility.

Finally, the adoption of the most accessible system currently available could be immensely aided by the addition of an additional paragraph in 2.2.7 Accessibility:

The adopting authority shall establish a selection committee to provide input regarding the acquisition by purchase, lease or other means of a voting system that includes individuals with disabilities; work cooperatively with disability-related organizations; and provide individuals with disabilities the opportunity to test a voting system before the adopting authority makes a decision regarding acquisition.

The FEC proposed rules only acknowledge two systems, Paper-based Systems and Direct Recording Electronic (DRE) systems. The DRE may be the best gadget on the market today, but a DRE is not a universally accessible system. I certainly would not suggest at this point in rule-

Ms. Penelope Bonsall

Page Three

making that you should change the presentation of rules for only two systems. However, the FEC should add language in the appropriate place to acknowledge the limitations of technology in accommodating certain individuals with disabilities and to present a vision for universal accessibility.

The quest to bring accessible voting to eligible voters is very much a core American value and the FEC Voluntary Standards represent significant progress. Thank you for the opportunity to comment on the proposed standards for computerized voting systems.

For A Barrier Free Society,

Dennis Borel

Executive Director